

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
Civil Action No.: 1:21-cv-00814-CCE-LRW

LARISSA HARPER HAIRGROVE,      )  
    )  
Plaintiff,                            )  
    )  
    )  
    )  
    )  
    )  
CITY OF SALISBURY, DOWNTOWN )  
SALISBURY INC., and LANE        )  
BAILEY, in his individual and official )  
capacity,                            )  
    )  
    )  
Defendant.                            )

**SECOND  
MOTION TO EXTEND  
THE DISCOVERY  
DEADLINE  
(CONSENT MOTION)**

NOW COMES the Plaintiff and moves the Court to extend the discovery deadline and in support of this Motion shows the Court the following:

1. The parties in the above-captioned matter have been diligently conducting discovery.
2. Plaintiff obtained public records from the State of North Carolina, Department of Commerce related to the Main Street program which is of central importance in this case, which came via an electronic link.
3. Plaintiff has made several attempts to provide these documents to Defendants.
4. Defendants' counsel have indicated that the link sent by Plaintiff's counsel is inaccessible to them.
5. Plaintiff's counsel sought assistance with issues she was having providing the

files but has so far been unsuccessful in remedying the issues.

6. In addition, Plaintiff's counsel's internet connectivity was intermittently unavailable today, the last day of discovery, and prevented her from making multiple alternative attempts to remedy the transmission problem in serving the additional documents.
7. Plaintiff's counsel reached out to Defendants' counsel and sought their position on a motion to extend the discovery period for a limited period of time due to Plaintiff's counsel's inability to obtain assistance in providing the documents by the end of the discovery deadline.
8. Defendants' counsel consent to this motion.
9. An extension of the discovery deadline in this case for two days up and including March 6, 2023, would not extend the dispositive motion deadline significantly.

For the foregoing reasons, the undersigned with consent of opposing counsel moved this Court to extend the discovery deadline up to and including the 6<sup>th</sup> day of March 2023.

Respectfully submitted, this the 2nd day of March 2023.

/S/ VALERIE L. BATEMAN  
Valerie L. Bateman  
NEW SOUTH LAW FIRM  
209 Lloyd Street, Ste 350  
Carrboro, North Carolina 27510  
Tel: 919-810-3139  
Fax: 919-823-6383  
NC State Bar No. 13417

/S/ JUNE K. ALLISON  
June K. Allison  
NEW SOUTH LAW FIRM  
233 S. Laurel Avenue  
Charlotte, NC 28207  
Tel: 704-277-0113  
Fax: 919-823-6383  
NC State Bar No. 9673

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that this **SECOND MOTION TO EXTEND THE DISCOVERY DEADLINE (CONSENT MOTION)** was filed with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record who have made an appearance in this matter.

This the 2d day of March 2023.

S/ VALERIE L. BATEMAN  
Valerie L. Bateman  
NEW SOUTH LAW FIRM